

September 15, 2010

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: Unlicensed Operation in the TV Broadcast Bands
ET Docket Nos. 04-186, 02-380 and 10-24; WT Docket Nos. 08-166 and 08-167*

Dear Ms. Dortch:

On September 14, 2010, Kerry Murray of Dell Inc., Paula Boyd of Microsoft Corp., and Edmond Thomas, Paul Margie, and Rob Carter of Wiltshire & Grannis LLP met with Commissioner Copps and his Legal Advisor John Giusti. In addition, Mr. Thomas met with Julius Knapp, Chief of the Office of Engineering and Technology.

During these meetings, Dell and Microsoft thanked the Commission for its work on the white spaces, and for moving forward to establish final white spaces rules at its September meeting. Dell and Microsoft highlighted the benefits of unlicensed access to spectrum below 1 GHz through the white spaces, including superior propagation characteristics and range compared with existing Wi-Fi frequencies. In addition, Dell and Microsoft discussed the importance of removing the sensing requirement for geolocation-enabled white space devices and reducing the size of “keep out” zones for Part 74 wireless microphones.

Finally, Dell and Microsoft discussed the fact that multiple channels will exist in every market where personal/portable white space operations are not permitted, that this spectrum can accommodate previously unauthorized wireless microphones, the potential impact on white space operations if previously unauthorized microphones are permitted to register for database protection, that database administrators should not determine the propriety of including previously illegal wireless microphones in the database, and that any rules regarding previously illegal wireless microphones should seek to avoid the confusion and incentives for improper use that characterized the past regime.

Ms. Marlene H. Dortch
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Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced dockets. If you require any additional information please contact the undersigned.

Sincerely yours,

/s/ Paul Margie

Paul Margie

cc: meeting attendees